

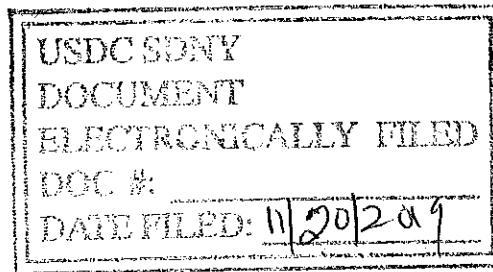


MEMO ENDORSED

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November 20, 2019

VIA ECF

Hon. Denise L. Cote, U.S.D.J.
U.S. District Court for the Southern District of New York

Re: Kelley-Hilton v. Sterling Infosystems Inc.
Civil Action No 19-cv-09963 (S.D.N.Y.)

Granted.
Denise Cote
11/20/19

Dear Judge Cote:

This firm represents Defendant Sterling Infosystems Inc. ("Sterling") in the above-referenced action. We write, with the consent of Plaintiff, to request a short extension to Defendant's deadline to submit its memorandum of law in opposition to the motion for a preliminary injunction, currently due today per Paragraph 1 of the Court's November 15, 2019 Order to Friday, November 22, 2019 by 5:00 p.m.. [Dkt. 20.]. Plaintiff has consented to this extension.

As Your Honor recalls, the parties were directed to exchange discovery by noon yesterday. Initial responsive documents were timely exchanged by both parties. However, after the deadline, Plaintiff supplemented her production with a number of additional lengthy audio recordings that Defendant's counsel, for technical reasons related to the manner in which they were produced and our firm's security system, was unable to access until this morning. A cursory review of the first few of these audio recordings reflect relevant telephonic communications between Plaintiff and several Sterling employees, some of whom will be submitting Declarations in support of Sterling's Memorandum in Opposition to Plaintiff's Request for Preliminary Injunction. At least two of the Sterling employees on these calls are traveling today further complicating the ability to meet today's filing deadline. We also note that the parties are preparing for and will be attending the court-ordered mediation tomorrow.

After a meet and confer, Plaintiff's counsel consented to an extension of Defendant's deadline to submit its memorandum in opposition to her motion for a preliminary injunction until Friday, November 22, 2019, at 5:00 p.m. We also advised Plaintiff that we no longer intend to file a cross-motion, and intend only to file an Opposition to Plaintiff's pending motion. No other dates or deadlines will be impacted by this modification.

In view of the parties' stipulation, we respectfully request the foregoing extension.

Thank you for Your Honor's courtesies and consideration.



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Respectfully submitted,

SEYFARTH SHAW LLP

/S/

Katherine E. Perrelli

KEP

cc: All counsel of record (via ECF)